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Attorneys for Plaintiff
11 UNITED STATES OF AMERICA

12 UNITED STATES DISTRICT COURT
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA,
15 Plaintiff,
16 v.
17 JOHNATHAN BUMA,
18 Defendant.
19
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No. CR 25-58-JVS

STIPULATION REGARDING REQUEST FOR
(1) CONTINUANCE OF TRIAL DATE AND
(2) FINDINGS OF EXCLUDABLE TIME
PERIODS PURSUANT TO SPEEDY TRIAL
ACT

CURRENT TRIAL DATE: 6/24/2025
PROPOSED TRIAL DATE: 12/9/2025

21 Plaintiff United States of America, by and through its counsel
22 of record, the United States Attorney for the Central District of
23 California and Assistant United States Attorney David T. Ryan and
24 Trial Attorney Menno Goedman, and defendant Johnathan Buma
25 ("defendant"), both individually and by and through his counsel of
26 record, Mark Geragos, Alexandra Kazarian, and Setara Qassim, hereby
27 stipulate as follows:
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1 1. The Information in this case was filed on April 17, 2025.
2 Defendant first appeared before a judicial officer of the court in
3 which the charges in this case were pending on May 1, 2025. The
4 Speedy Trial Act, 18 U.S.C. § 3161, originally required that the
5 trial commence on or before July 10, 2025.

6 2. On May 1, 2025, the Court set a trial date of June 24,
7 2025, and a status conference date of June 16, 2025.

8 3. Defendant is released on bond pending trial. The parties
9 estimate that the trial in this matter will last approximately four
10 to five days.

11 4. By this stipulation, defendant moves to continue the trial
12 date to December 9, 2025, and the status conference to December 1,
13 2025. This is the first request for a continuance.

14 5. Defendant requests the continuance based upon the following
15 facts, which the parties believe demonstrate good cause to support
16 the appropriate findings under the Speedy Trial Act:

17 a. Defendant is charged with a violation of Title 18,
18 United States Code, Section 1905: Disclosure of Confidential
19 Information. The government has made certain discovery available to
20 the defense, including search warrants and reports of investigation.
21 Much of the discovery in the case is sensitive in nature and must be
22 produced pursuant to a protective order. The parties are preparing a
23 stipulation for a protective order to be filed with the Court in the
24 coming days. Following entry of a protective order, the government
25 is prepared to produce a significant amount of protected discovery.

26 b. On May 1, 2025, defendant's current counsel
27 substituted in as counsel of record. Defense counsel is presently
28 scheduled to be in a criminal trial on June 30, 2025, in United

1 States v. Magzanyan, CR No. 20-254-JAD-EJY, in the Central District
2 of Nevada, which is estimated to last one week; a criminal trial on
3 July 7, 2025, in People v. Opmanis, No. FSB19002771, in the Superior
4 Court of California, County of San Bernardino, which is estimated to
5 last two weeks; a civil trial on July 8, 2025, in Bentley Meeker
6 Lighting & Staging, Inc. v. Stephen Robert Mason, Index No.
7 160493/2017, in New York Supreme Court, which is estimated to last
8 two days; a civil trial on July 21, 2025, in Diane Bhalawan aka
9 Deyana Mounira v. Tony Toutouni, Case No. 20STCV41252, in the
10 Superior Court of the State of California, County of Los Angeles,
11 which is estimated to last three days; a criminal trial on August 19,
12 2025, in United States v. Sangha et al., CR No. 24-236-SPG, in the
13 Central District of California, which is estimated to last three
14 weeks; a civil trial on September 25, 2025, in Shirley Huffman, et
15 al. v. City of Los Angeles et al., Case No. 22STCV38178, in the
16 Superior Court of the State of California, County of Los Angeles,
17 which is estimated to last ten days; a civil trial on October 20,
18 2025, in Gevorg Danelyan, et al. vs. Kenneth Kita, MD, et al., Case
19 No. 23GDCV01926, in the Superior Court of the State of California,
20 County of Los Angeles, which is estimated to last ten days; a
21 criminal trial on October 28, 2025, in United States v. Salgado, CR
22 No. 24-201-JGB, in the Central District of California, which is
23 estimated to last one week; and a civil trial on November 3, 2025, in
24 Rachel Levis v. Thomas Sandoval et al., Case No. 24STCV05072, in the
25 Superior Court of the State of California, County of Los Angeles,
26 which is estimated to last two weeks. Accordingly, counsel
27 represents that they will not have the time that they believe is
28 necessary to prepare to try this case on the current trial date.

1 c. In light of the foregoing, counsel for defendant also
2 represent that additional time is necessary to confer with defendant,
3 conduct and complete an independent investigation of the case,
4 conduct and complete additional legal research including for
5 potential pre-trial motions, review the discovery and potential
6 evidence in the case, and prepare for trial in the event that a
7 pretrial resolution does not occur. Defense counsel represent that
8 failure to grant the continuance would deny them reasonable time
9 necessary for effective preparation, taking into account the exercise
10 of due diligence.

11 d. Defendant believes that failure to grant the
12 continuance will deny him continuity of counsel and adequate
13 representation.

14 e. The government does not object to the continuance.

15 f. The requested continuance is not based on congestion
16 of the Court's calendar, lack of diligent preparation on the part of
17 the attorney for the government or the defense, or failure on the
18 part of the attorney for the Government to obtain available
19 witnesses.

20 6. For purposes of computing the date under the Speedy Trial
21 Act by which defendant's trial must commence, the parties agree that
22 the time period of June 24, 2025 to December 9, 2025, inclusive,
23 should be excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A),
24 (h)(7)(B)(i), and (h)(7)(B)(iv) because the delay results from a
25 continuance granted by the Court at defendant's request, without
26 government objection, on the basis of the Court's finding that:
27 (i) the ends of justice served by the continuance outweigh the best
28 interest of the public and defendant in a speedy trial; (ii) failure

1 to grant the continuance would be likely to make a continuation of
2 the proceeding impossible, or result in a miscarriage of justice; and
3 (iii) failure to grant the continuance would unreasonably deny
4 defendant continuity of counsel and would deny defense counsel the
5 reasonable time necessary for effective preparation, taking into
6 account the exercise of due diligence.

7 7. Nothing in this stipulation shall preclude a finding that
8 other provisions of the Speedy Trial Act dictate that additional time
9 periods be excluded from the period within which trial must commence.
10 Moreover, the same provisions and/or other provisions of the Speedy
11 Trial Act may in the future authorize the exclusion of additional
12 time periods from the period within which trial must commence.

13 IT IS SO STIPULATED.

14 Dated: June 2, 2025

Respectfully submitted,


15 BILAL A. ESSAYLI
16 United States Attorney

17 /s/
18 DAVID T. RYAN
19 Assistant United States Attorney
Chief, National Security Division

20 MENNO GOEDMAN
21 Trial Attorney
National Security Division

22 Attorneys for Plaintiff
UNITED STATES OF AMERICA
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1 I am Johnathan Buma's attorney. I have carefully discussed
2 every part of this stipulation and the continuance of the trial date
3 with my client. I have fully informed my client of his Speedy Trial
4 rights. To my knowledge, my client understands those rights and
5 agrees to waive them. I believe that my client's decision to give up
6 the right to be brought to trial earlier than December 9, 2025, is an
7 informed and voluntary one.

8 
9 Mark Geragos
10 Alexandra Kazarian
Setara Qassim

Date

11 Counsel for Defendant
12 Johnathan Buma

13 I have read this stipulation and have carefully discussed it
14 with my attorney. I understand my Speedy Trial rights. I voluntarily
15 agree to the continuance of the trial date, and give up my right to
16 be brought to trial earlier than December 9, 2025. I understand that
17 I will be ordered to appear in Courtroom 10C of the Ronald Reagan
18 Federal Building and United States Courthouse, 411 West Fourth
19 Street, Santa Ana, California on December 9, 2025, at 8:30 A.M.

20 
21 JOHNATHAN BUMA
22 Defendant

June 3, 2025

Date